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November 9, 2022

VIA EMAIL (redacted version filed via ECF)

The Honorable Judge John G. Koeltl
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Hayes, et al.*, No. 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We respectfully submit this letter on behalf of Arthur Hayes pursuant to 18 U.S.C. § 3563(c) to request modification of the conditions of Mr. Hayes's probation [REDACTED]

[REDACTED]
[REDACTED] On May 20, 2022, the Court sentenced Mr. Hayes to two years' probation, with a six-month term of home detention with electronic monitoring. *See* ECF No. 344. Mr. Hayes's home detention will conclude on January 11, 2023. Mr. Hayes will be subject to unsupervised probation thereafter, with permission to travel internationally, until the conclusion of his sentence. *Id.* [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Accordingly, we respectfully request that the Court permit Mr. Hayes to travel from his current residence in Miami, Florida, to [REDACTED] from December 20, 2022 to December 27, 2022 [REDACTED]
[REDACTED]

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The government also consents to Mr. Hayes's requests.

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allow him to return [REDACTED]. They did, however, allow him permission to reside in, and travel to and from, Singapore. *See* ECF No. 47. Mr. Hayes traveled to Singapore multiple times during the pretrial phase of this case, each time returning to the United States.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

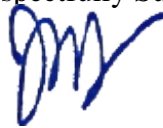
Mr. Hayes Will Return to Complete His Home Detention

As noted in the Presentence Investigation Report, Mr. Hayes “is not viewed as a flight risk or danger to the community.” PSR at 46. He was compliant with all aspects of his pretrial release, which allowed Mr. Hayes to travel to and from, and reside, in Singapore. *Id.* Mr. Hayes made multiple trips between the United States and Singapore during the pendency of his pretrial release. *Id.* Since Mr. Hayes’s sentencing, he has complied with all conditions of his probation. Mr. Hayes has no reason to change course now when he is so close to the end of his home detention period.

In sum, we respectfully request that the Court permit Mr. Hayes to travel from Miami, Florida [REDACTED] without his electronic bracelet from December 20, 2022 to December 27, 2022.

We appreciate the Court’s attention to this request.

Respectfully Submitted,



James Joseph Benjamin, Jr.

cc: AUSAs Jessica Greenwood, Samuel Raymond, and Nathan Rehn (*via email and ECF*)
USPO Harry Marcelin (*via email*)

[REDACTED]

[REDACTED]